

UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA }
v. }
JAMIE EDELKIND, }
defendant. }

F I L E D
2005 FEB 14 P 4:43
U.S. DISTRICT COURT
CRIMINAL NO. 04-10066-GORMEL
DISTRICT OF MASS.

UNITED STATES' EXHIBIT LIST

The United States currently anticipates offering the following exhibits:

Marked for I.D.	Proposed Ex. No.	Description
A	1	Certified Copies of America's Moneyline Inc. Business Records
A1	1a	Certificate of Authenticity of Business Records
A2	1b	September 14, 2000 Loan Underwriting Denial Form
A3	1c	August 2000 Loan Application
A4	1d	Uniform Underwriting Transmittal Summary
A5	1e	August 1, 2000 Letter from "Margrethe Thortveit"
A6	1f	"Affidavit of Margrethe Thortveit"
A7	1g	August 22, 2000 letter from "Human Resources Manager" of Apostille, Inc.
A8	1h	Payment records of Linda Edelkind
A9	1i	1999 Form W-2 Wage and Tax Statement
A10	1j	January 2001 Borrower's Certification
A11	1k	January 2001 Mortgage
A12	1l	Mortgage/Rent Payment Analysis
A13	1m	Summit National Bank checks
A14	1n	August 1, 2000 Letter from "Margrethe Thortveit"
A15	1o	Verification of Employment Form
A16	1p	Fax of Verification of Employment Form to Margrethe Thortveit
A17	1q	Debenture Statement for Apostille Inc.
A18	1r	Payment records of Linda Edelkind

A19	1s	Michael Medvitz notes titled "Needed for Edelkind"
A20	1t	Telephone Audit of Loan Documents
A21	1u	September 2000 Loan Application
A22	1v	January 2001 Loan Application
A23	1w	Confirmation of Withdrawal of Loan Application
A24	1x	May 2001 Loan Application
A25	1y	2000 Form W-2 Wage and Tax Statement
A26	1z	Payment records of Linda Edelkind
A27	1aa	April 2003 Underwriting Pre-Qualification Review Analysis
A28	1bb	Loan Status
A29	1cc	Risk Analysis
B	2	Certified Copies of South Shore Savings Bank Business Records
B1	2a	Certificate of Authenticity of Business Records
B2	2b	September 2001 Loan Application
B3	2c	Loan Submission Report
B4	2d	Settlement Statement
B5	2e	September 2001 Adjustable Rate Note
B6	2f	September 12, 2001 Letter from South Shore Savings Bank to Linda Edelkind
B7	2g	August 1, 2001 Email from jedelkind@mediaone.net to Brian Desmond
B8	2h	August 14, 2001 Letter authorizing Jamie Edelkind to speak to South Shore on Linda Edelkind's behalf
B9	2i	Payment records of Linda Edelkind
B10	2j	IRS Form 1040 for Linda Edelkind, 2000
B11	2k	IRS Form 1040 for Linda Edelkind, 1999
B12	2l	IRS Form W-2 for Linda Edelkind, 2000
B13	2m	IRS Form W-2 for Linda Edelkind, 1999
B14	2n	July 2001 Loan Application
B15	2o	Borrower's Certification & Authorization
B16	2p	South Shore Savings Bank Qualification Worksheet
B17	2q	Loan Originators Sheet

B18	2r	Documentation Requested
C	3	Certified Copies of Household Finance Corporation Business Records
C1	3a	Certificate of Authenticity of Business Records
C2	3b	April 12, 2002 Loan Application in Jamie Edelkind's name
C3	3c	April 16, 2002 Loan Application in Linda Edelkind's name
C4	3d	April 2002 "Discharge of Mortgage"
C5	3e	April 2002 Mortgage
C6	3f	Payment records of Linda Edelkind
C7	3g	IRS Form W-2 for Linda Edelkind, 2001
C8	3h	IRS Form W-2 for Linda Edelkind, 2000
D	4	Certified Copies of Wells Fargo Bank, N.A. Business Records
D1	4a	Certificate of Authenticity of Business Records
D2	4b	March 26, 2003 letter from Linda Edelkind and Jamie Edelkind adding Jamie Edelkind to line of credit
D3	4c	Payment records of Linda Edelkind
D4	4d	IRS Form W-2 for Linda Edelkind, 2000
D5	4e	IRS Form W-2 for Linda Edelkind, 2001
D6	4f	May 2002 Mortgage
E	5	Certified Copies of Countrywide Home Loans, Inc. Business Records
E1	5a	Certificate of Authenticity of Business Records
E2	5b	May 2002 Mortgage (Line of Credit)
E3	5c	April 2002 "Discharge of Mortgage"
E4	5d	IRS Form W-2 for Linda Edelkind, 2001
E5	5e	IRS Form W-2 for Linda Edelkind, 2000
E6	5f	Payment records of Linda Edelkind
E7	5g	May 22, 2002 Countrywide Loan Underwriting Expert System
E8	5h	April 10, 2002 Countrywide Loan Underwriting Expert System
E9	5i	Borrower's Certification and Authorization
E10	5j	May 2002 Settlement Statement
E11	5k	April 2002 Loan Application
E12	5l	May 2002 Loan Application

E13	5m	Uniform Underwriting and Transmittal Summary
F	6	Certified Copies of Washington Mutual Bank, F.A. Business Records
F1	6a	Business Records Certification
F2	6b	Declaration Accompanying Business Records
F3	6c	January 2003 Loan Application
F4	6d	Verbal Verification of Employment – RBC Mortgage
F5	6e	March 2003 Settlement Statement
F6	6f	March 2003 Mortgage
F7	6g	March 2003 Loan Application
F8	6h	Loan Approval Summary
F9	6i	Underwriting Report
F10	6j	MGIC Loan Performance Score
F11	6k	Loan Approval Summary
F12	6l	MGIC Loan Performance Score
F13	6m	HMDA Audit
F14	6n	Loan Approval Summary
F15	6o	WhitePages.com printout reflecting Apostille Inc. in Hull, MA
F16	6p	Uniform Underwriting and Transmittal Summary
F17	6q	Loan File Order Checklist
F18	6r	Lending Inquiry-Borrower Data
F19	6s	Settlement Statement
F20	6t	Verbal Verification of Employment – Washington Mutual
G	7	Certified Copies of Sunset Mortgage Company Inc. Business Records
G1	7a	Certificate of Authenticity of Business Records
G2	7b	January 30, 2004 Letter from Jamie Edelkind regarding tax returns
G3	7c	Payment records of Linda Edelkind
G4	7d	Loan Application
G5	7e	Borrower's Certification and Authorization
G6	7f	March 3, 2004 Email from Luxury Mortgage to Sunset Mortgage regarding deferred income
G7	7g	Uniform Underwriting and Transmittal Summary

H	8	Certified Copies of WCS Business Records
H1	8a	Certificate of Authenticity of Business Records
H2	8b	June 2004 Loan Application
H3	8c	Underwriting Suspense Notice
H4	8d	Articles of Incorporation for Apostille.Net Inc.
I	9	Certified Copies of XL Lending Group Business Records
I1	9a	Certificate of Authenticity of Business Records
I2	9b	June 2004 Loan Application
I3	9c	August 9, 2004 Fax from Richard K. O' Connor, CPA
I4	9d	August 12, 2004 Letter from Linda Edelkind
J	10	Certified Copies of Fairmont Funding LTD Business Records
J1	10a	Certificate of Authenticity of Business Records
J2	10b	August 26, 2004 email from Fairmont to Rate Lock Alias
J3	10c	August 25, 2004 Mortgage
J4	10d	Estimated First Payment Letter
J5	10e	August 2004 Loan Application
J6	10f	June 2004 Loan Application
J7	10g	Disclosure Notice
J8	10h	Occupancy Agreement
J9	10i	Borrower's Certification & Authorization
J10	10j	Settlement Statement
J11	10k	Aurora Loan Services Submission Transmittal
J12	10l	August 9, 2004 Letter from Richard O'Connor
J13	10m	Letter from Philip Gordon, Esq.
J14	10n	August 26, 2004 Fax to Jamie Edelkind from IRS attaching letter regarding Apostille EIN
J15	10o	August 24, 2004 Email from Linda Ecline to Issac Aryeh regarding Delaware Statement of Good Standing
J16	10p	Letter from Linda Edelkind on Apostille letterhead
J17	10q	August 11, 2004 letter from Linda Edelkind regarding attorney mortgages

J18	10r	August 12, 2004 letter from Linda Edelkind regarding attorney mortgages
K	11	Certified Copies of Aurora Loan Servicing Business Records/Lehman Brothers FSB Records
K1	11a	Certificate of Authenticity of Business Records
K2	11b	August 25, 2004 Underwriting Approval Notice
K3	11c	August 24, 2004 Underwriting Approval Notice
K4	11d	August 24, 2004 Underwriting Approval Notice
K5	11e	August 18, 2004 File Review
K6	11f	July 29, 2004 Underwriting Approval Notice
K7	11g	July 26, 2004 Underwriting Approval Notice
K8	11h	August 9, 2004 Letter from Richard O'Connor
K9	11i	Certificate of Good Standing for Apostille.Net Inc.
K10	11j	Letter from Linda Edelkind on Apostille stationary
K11	11k	August 24, 2004 Email from Chaya Cohen to Scott Brown
K12	11l	EIN Search printout
K13	11m	D&B Report regarding Apostille
K14	11n	Massachusetts Secretary of State search printout regarding Linda Edelkind
K15	11o	Massachusetts Secretary of State search printout regarding Apostille.Net Inc.
K16	11p	Massachusetts Secretary of State search printout regarding Apostille
K17	11q	Uniform Underwriting and Transmittal Summary
K18	11r	Loan Application
K19	11s	D&B Report regarding Apostille
K20	11t	August 12, 2004 Letter from Linda Edelkind regarding Gordon & Balikian mortgages
K21	11u	Loan Registration
K22	11v	June 2004 Loan Application
K23	11w	Loan Registration
K24	11x	Fax from Olympia Mortgage
K25	11y	IRS Letter regarding Apostille EIN

K26	11z	Blank Massachusetts DOR Forms W42 for Apostille
K27	11aa	August 25, 2004 Letter from Richard O'Connor
K28	11bb	State of Delaware record printout
K29	11cc	ALS Branchburg Flow
K30	11dd	Letter from Fairmont to Linda Edelkind
K31	11ee	Fairmont Funding Check No. 22730, in the amount of \$18,926.80, made payable to Linda Edelkind
K32	11ff	August 25, 2004 Underwriting Approval Notice
K33	11gg	Closing Checks
K34	11hh	Uniform Underwriting Transmittal Summary
K35	11ii	VirPack: Document (Income) section of loan file
K36	11jj	August 2004 Loan Application
K37	11kk	Occupancy Agreement
K38	11ll	Disclosure Agreement
L	12	Certified Copy of Federal Deposit Insurance Corporation Proof of Insured Status for Lehman Brothers Bank, FSB
M	13	Certified Copy of Federal Deposit Insurance Corporation Proof of Insured Status for South Shore Savings Bank
N	14	Certified Copy of Federal Deposit Insurance Corporation Proof of Insured Status for Wells Fargo Bank, N.A.
O	15	Certified Copy of Federal Deposit Insurance Corporation Proof of Insured Status for Washington Mutual Bank, F.A.
P	16	Certified Copy of Apostille.Net, Inc. Certificate of Incorporation from State of Delaware Secretary of State
Q	17	Business Records Certification and Authentication Declaration (Absence of Record of Linda Edelkind) of Trinet, Inc.
R	18	Certified Copies of Trinet, Inc. business records regarding Jamie Edelkind
S	19	Certified Copies of The Summit National Bank business records regarding statements of Account Number XXXX7789 held in the name of Linda Edelkind
T	20	Certified Copies of The Summit National Bank business records regarding opening of Account Number XXXX7789 held in the name of Linda Edelkind

U	21	Certified Copies of Fleet Bank business records regarding statements of Account Number XXXXXX8261 held in the name of Linda Edelkind
V	22	Certified Copies of Fleet Bank business records regarding deposit and withdrawal items for Account Number XXXXXX8261 held in the name of Linda Edelkind
W	23	Certified Copies of Mortgage Brokers Inc. Business Records
W1	23a	Certificate of Authenticity of Business Records
W2	23b	May 1999 Loan Application
W3	23c	May 27, 1999 Fax from Jamie Edelkind attaching IRS Form W-2s for Jamie Edelkind, 1996, 1997 and 1998
W4	23d	May 7, 1999 Fax from Tachyon
W5	23e	May 10, 1999 Memo from Tachyon regarding Mercedes
W6	23f	May 24, 1999 Letter from Tachyon regarding taxes
W7	23g	IRS Form 1040 for Jamie Edelkind, 1998
W8	23h	April 1, 1999 Letter from Tachyon regarding employment
W9	23i	May 12, 1999 Letter from Tachyon to Linda Edelkind regarding employment and salary
W10	23j	May 12, 1999 Letter from Tachyon to Jamie Edelkind regarding employment and salary
W11	23k	Pay records regarding Jamie Edelkind
W12	23l	Pay records regarding Linda Edelkind
X	24	Certified Copies of Lufthansa German Airlines business records
Y	25	Certified Copy of Information in <u>United States v. Jamie Edelkind</u> , Criminal No. 04-10066-MEL, United States District Court, District of Massachusetts
Z	26	Certified Copies of Rainbow Movers business records
AA	27	Apostille Business Plan
BB	28	Inmate Telephone Monitoring CD Recording, Reg No. 11866-035, Call Dates 10/15/2004 – 1/3/2005 ¹
CC	29	IRS Certification of Lack of Record regarding Linda Edelkind
DD	30	IRS Certification of Lack of Record regarding Apostille.Net Inc.

¹ The government will designate portions of the Inmate Telephone Monitoring CD Recording and forward to defense counsel for cross-designation in advance of trial.

EE	31	IRS Certification of Lack of Record regarding Apostille Incorporated
FF	32	IRS Certification of Lack of Record regarding Apostille Inc.
GG	33	IRS Certification of Lack of Record regarding Tachyon Holdings Ltd. Inc.
HH	34	Certified Copy of IRS Form 1040 regarding Linda Edelkind, 2003
II	35	Certified Copy of IRS Form 1040 regarding Jamie Edelkind, 1998
JJ	36	Certified Return View Transcript of IRS Form 1040 regarding Linda Edelkind, 2002
KK	37	Certified Return View Transcript of IRS Form 1040 regarding Linda Edelkind, 2001
LL	38	Certified IRS Information Returns Processing Transcript for Linda Edelkind, 2001
MM	39	Certified IRS Information Returns Processing Transcript for Linda Edelkind, 2002
NN	40	Certified IRS Information Returns Processing Transcript for Linda Edelkind, 2003
OO	41	Certified transcript of account retrieved from IRS Automated Collection System database regarding Linda Edelkind, 2001 and 2002
PP	42	Certified transcript of IRS account regarding Linda Edelkind, 2001
QQ	43	Certified transcript of IRS account regarding Linda Edelkind, 2002
RR	44	Certified transcript of IRS account regarding Linda Edelkind, 2003
SS	45	Certified Copy of Guilty Plea and Plea Agreement in <u>United States v. Jamie Edelkind</u> , Criminal No. 1:30-CR-364-CAP, United States District Court, Northern District of Georgia
TT	46	Certified Copy of 1991 Bankruptcy Petition of Jamie Edelkind
UU	47	Certified Copy of 1999 Bankruptcy Petition of Jamie Edelkind
VV	48	Certified Copy of Dismissal/Discharge of 1999 Bankruptcy Petition of Jamie Edelkind
WW	49	Certified Copies of Cobb County Registry of Deeds Information Regarding 122 Paces Run, Atlanta Georgia

Respectfully submitted,

MICHAEL J. SULLIVAN
United States Attorney

Dated: February 14, 2005

By:


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CERTIFICATE OF SERVICE

I hereby certify that on this day I will cause a true copy of the above document to be served by hand upon counsel of record for defendant, addressed as follows:

ROBERT L. SHEKETOFF, ESQ.
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February 14, 2005


KRISTINA E. BARCLAY